



HT/2376-04/MH

POST AND EMAIL

24 December 2013

Ms. M. Haworth
Programmer Officer
Examination Office
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
BB7 2RA

Dear Ms Haworth

**Ribble Valley Core Strategy Independent Examination in Public
PRN Number: 7359**

I write to inform you that we are not proposing to make further representations on the Core Strategy at this stage, as our clients objections have clearly been set out in our letter of 19 September 2013 (copy enclosed). Our client wishes to rely upon those written representations and subsequent involvement in the Examination in Public.

Should you have any questions please do not hesitate to contact Steven Abbott, Richard Percy or myself on 01257 251177.

Yours sincerely

Harry Tonge

Enc

Email: harryt@abbott-associates.co.uk

Partners

Steven H Abbott BSc (Hons) MRTPI
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HT/DB/2376-01/RVBC

POST AND EMAIL

19 September 2013

Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
BB7 2RA

Dear Sir/Madam

CORE STRATEGY CONSULTATION

This letter should be read in conjunction with the enclosed comments form.

Comments on Proposed Change Ref: 08

Reasons the CS is not sound

The Council propose an increase in the number of dwellings to be provided over the plan period to 5,000 which equates to an average annual completion target of 250 dwellings per year. The reason for this change given by the Council is to reflect the most up to date information.

The key evidence base document to consider when assessing the future housing need for the Borough is the *Implications of the 2011-based CLG Household Projections* report which was produced by Nathaniel Lichfield & Partners in May 2013 (hereafter referred to as the "NLP report"). This is the report that RVBC has used to justify an annual housing target of 250 dwellings. However the Report's conclusions are clear in stating that more than 250 dpa will be required to meet the Council's own recently adopted economic growth aspirations. With regard to a range of between 220 dpa and 250 dpa, the NLP report states:

This would, at a minimum, meet need and demand arising from future projected demographic change within the Borough, but also (at the top end of the range) support some economic growth, and would deliver affordable housing to respond to (at least some of) identified local needs.

This acknowledges that a housing target of 250 dpa will not be sufficient to allow the Borough to meet all of its identified economic growth aspirations. The NLP report goes onto state the following:

Partners

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To ensure that there is no disconnect between the housing requirement and the Council's job growth aspirations, in order to justify a figure below 280 dpa, RVBC would need to demonstrate how it would mitigate or avoid the adverse housing, economic and other outcomes that a lower-growth approach could give rise to.

At this stage RVBC has not been able to demonstrate how it would mitigate or avoid these adverse impacts of a lower housing target, or in fact if they could mitigate or avoid the impacts. Based on the evidence base it is clear that in order meet the economic growth aspirations of the Borough an annual housing target of at least 280 dpa would be necessary. A key element of plan-making is an integrated approach, which is emphasised in paragraph 158 of the National Planning Policy Framework which states:

Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

It is important for the sustainable growth of the Borough that the housing targets are linked to the economic growth aspirations. A housing target of 250 dpa will not allow the Borough to meet its economic growth aspirations in full, which is clearly not an acceptable situation.

Also, the words 'at least' are proposed to be deleted in relation to the annual housing target. The Council are not correct in doing this; the annual target is a minimum and its officers are on the record of stating that fact. The deletion of 'at least' could lead to the annual housing target being treated as a maximum.

These concerns are highly relevant in terms of the tests of soundness that must be applied to the Core Strategy.

- **Positively Prepared.** In order to be 'positively prepared' the Core Strategy must be based on a strategy which seeks to meet objectively assessed development and infrastructure needs. The proposed change is welcomed in so far as it moves closer to a position which seeks to meet the objectively assessed housing needs. However, there remains a risk of the Core Strategy being unsound unless it seeks to meet the objectively assessed need in full.
- **Justified.** In order to be justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. The approach put forward by the Council will have to be fully justified by the Council at Examination to show that all reasonable alternatives (including a strategy to meet the objectively assessed housing need in full) have been considered and assessed, and that the approach chosen is the most appropriate strategy.

- Consistent with National Policy. The National Framework is clear (paragraphs 47 and 159) that Local Planning Authorities must assess their full housing needs and must ensure that their Local Plan meets the full objectively assessed need. The approach adopted in the Core Strategy recognises the full housing need requirement identified by the up-to-date NLP report (at least 280 dwellings per annum), but does not ensure that need is met.

Whilst the proposed change (08) goes some way to addressing the issue we remain of the view that the approach to housing requirements within the Core Strategy is not sound when considered in light of the relevant tests of soundness. It is vital that these matters are addressed as the housing strategy is a fundamental aspect at the heart of the Core Strategy.

It is our view, given the reasons set out above, that the proposed Core Strategy is unsound as it is not positively prepared, justified or consistent with national policy.

On behalf of our clients' we offer the following suggested amended wording for the subject policy:

KEY STATEMENT H1: HOUSING PROVISION

Land for residential development will be made available to deliver ~~5000~~ at least 5600 dwellings, ~~estimated~~ at an average annual completion ~~target~~ rate of ~~250~~ 280 dwellings per year over the period 2008 to 2028 in accordance with baseline information.

We would be pleased to discuss the above with Council officers to assist.

Steven Abbott Associates LLP for The Trustees of the Standen Estate, September 2013

Yours faithfully



Harry Tonge BA (Hons) MCD MRTPI

Email: harryt@abbott-associates.co.uk

For official use		Ref. No.
		Ack'd



Before using this form to make any comments please ensure that you have read the Core Strategy Proposed Main Changes document and the Guidance Notes, which can be found on Ribble Valley Borough Council's website - www.ribblevalley.gov.uk and follow the Core Strategy link. If after reading the Guidance Notes you should have any queries in completing the form please telephone 01200 425111.

This form has two parts: -

Part A - Personal Details (you need only complete one copy of Part A)

Part B - Your comment(s) (Please complete a separate Part B for each comment you wish to make.)

All completed comments forms must be received by the Council no later than 5:00pm on Friday 20th September 2013.

Please return paper copies marked 'CORE STRATEGY CONSULTATION' to Council Offices, Church Walk, Clitheroe, BB7 2RA

Part A

Q1 Please can you provide the following information which will assist us in contacting you if we need to discuss any of your comments further.

Name	Harry Tonge
Name of Organisation (if you are responding on behalf of an organisation)	Steven Abbott Associates LLP
Database Reference number (if you have one)	
Address	Broadsword House, 2 Stonecrop Appley Bridge, Wigan
Post Code	WN6 9DL
Email address	harryt@abbott-associates.co.uk
Phone number	01257 251177

Copies of all comments made in Part B of the form will be put in the public domain and are not confidential, apart from any personal information. All personal information within Parts A and B will only be used by the Council in connection with the Local Development Framework and not for any other purpose and will be held in accordance with the Data Protection Act 1998. The Council will summarise the comments and all representations will be made available to the Planning Inspectorate.

Part B

Please use a separate form for each individual comment.

Q2

Name / Name of Organisation (if you are responding on behalf of an organisation)

Trustees of the Standen Estate

Q3

To which part of the Core Strategy Proposed Main Changes Document does this comment relate?

Amendment No.

08 - Chapter 6: Housing

Q4

As a consequence do you consider the Core Strategy is:

i) Legally compliant

Yes

No

ii) Sound *

* The considerations in relation to the Core Strategy being sound are explained in the Guidance Notes

Q5

If you consider the Core Strategy is unsound, is this because it is not... (please tick the appropriate box)

Justified

Consistent with national policy

Effective

Positively prepared

Q6

Please give details of why you consider that the Core Strategy is not legally compliant or sound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments. *Please continue on a separate sheet if required.*

PLEASE SEE ATTACHED LETTER

Q7 Please set out what change(s) to the Proposed Main Changes to the Submitted Core Strategy document you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness.

You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible. *Please continue on a separate sheet if required.*

PLEASE SEE ATTACHED LETTER

Please note: your comment should cover succinctly all the information, evidence, and supporting information necessary to support/justify the comment and the suggested change, as there will not normally be another opportunity to make further comments.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination in the forthcoming Examination in Public.

Q8 If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I do wish to participate at the oral examination

Q9 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. *(Please note that the Inspector will determine who participates.) Please continue on a separate sheet if required.*

There are detailed discussions needed in relation to the housing need in the Borough.

Q10 If you wish to be kept informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the box(es) below.

The publication of the Inspector's report following the Examination

The formal adoption of the Core Strategy

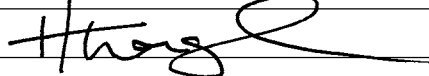
Q11 If you have any other comments to make on the Core Strategy that have not been covered elsewhere, please use the box below. *Please continue on a separate sheet if required.*

N/A

Q12 Date of completion

19092013

Q13 Signature



Thank you very much for taking the time to complete this comments form, your comments are very much appreciated.

If after reading the Guidance Notes you should have any queries in completing this form please telephone 01200 425111